

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: U S WEST COMMUNICATIONS, INC., n/k/a QWEST CORPORATION	DOCKET NOS. INU-00-2 SPU-00-11
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**REQUEST FOR COMMENTS REGARDING
CLOSED/UNRESOLVED OBSERVATION AND EXCEPTIONS
IN THE ROC OSS TEST**

(Issued May 6, 2002)

On February 10, 2000, the Utilities Board (Board) issued an order initiating an investigation relating to the possible future entry of U S WEST Communications, Inc., n/k/a Qwest Corporation (Qwest), into the interLATA market. The investigation was identified as Docket No. INU-00-2.

On April 19, 2002, KPMG Consulting (KPMG) and Hewlett-Packard Consulting (HP) released a draft final report on Qwest's operations support systems (OSS). Qwest filed a summary on May 3, 2002, of one observation and five exceptions that it had elected to take as "closed/unresolved" with explanations related to each instance. In an additional filing on May 3, 2002, Qwest addressed the remaining three exceptions that it elected to take as closed/unresolved. These additional three exceptions relate to Qwest's Change Management Process (CMP).

As explained by Qwest in its May 3, 2002, filing, during the Regional Oversight Committee (ROC) OSS test, the test vendors issued observations and exceptions

when situations were encountered that could, without explanation or further testing, result in negative findings in a final report. Observations identified questions or potential deficiencies that **could**, on further investigation, contribute to negative finds. Exceptions identified deficiencies that **would** result in negative findings if left unresolved.

When the ROC OSS test was established, the parties agreed that Qwest would be permitted to request that any observation or exception be closed in an "unresolved" status when Qwest determined that further modification and testing would not be productive.

Qwest argues that the status of these closed/unresolved observations and exceptions are inconsequential as demonstrated through additional evidence and as such should not affect the Board's ability to conclude that Qwest's OSS satisfies the requirements of 47 U.S.C. 271(c)(2)(B)(ii). It would be helpful to the Board in its deliberations to receive responsive comments from interested participants related to the observation and exceptions that Qwest chose to take as closed/unresolved.

IT IS THEREFORE ORDERED:

Any participant desiring to file comments concerning Qwest's closed/unresolved observation and exceptions from the ROC OSS test may do so on or before May 13, 2002.

UTILITIES BOARD

/s/ Diane Munns

/s/ Mark O. Lambert

ATTEST:

/s/ Judi K. Cooper
Executive Secretary

/s/ Elliott Smith

Dated at Des Moines, Iowa, this 6th day of May, 2002.